# Exhibit 2

### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

| SVETLANA LOKHOVA, | )           |                                       |
|-------------------|-------------|---------------------------------------|
| Plaintiff,        | )           |                                       |
| v.                | )           | Civil Action No. 1:20-cv1603(LMB)(WF) |
| STEFAN A. HALPER, | )           |                                       |
| Defendant.        | )<br>)<br>) |                                       |

#### NOTICE OF DEPOSITION OF SVETLANA LOKHOVA

To: SVETLANA LOKHOVA, Plaintiff

c/o Leslie McAdoo Gordon, Esq. MCADOO GORDON & ASSOCIATES, P.C. 1629 K Street, N.W., Suite 300. Washington, DC 20006

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30 and Fed. R. Civ. P. 45, counsel for Defendant will take the deposition of Svetlana Lokhova on September 6, 2022 beginning at 10 a.m. The deposition will be taken upon oral examination of the person whose name is stated above at the time and place indicated before a notary public or other officer authorized to administer oaths authorized by law to take depositions in the Commonwealth of Virginia. The deposition will be done in person and may be videotaped.

The deposition is being taken for the purposes of discovery, for use at trial, or for other such purposes as are permitted under the applicable and governing rules. If necessary, the deposition shall continue from day to day until completed. In compliance with the Americans

with Disabilities Act of 1990, you are hereby notified that if you require special accommodations due to a disability, you should contact Terrance G. Reed no later than seven (7) days prior to the date your appearance is required pursuant to this notice to ensure that reasonable accommodations are available.

Robert Luskin

Admitted Pro Hac Vice

Paul Hastings LLP

875 15th ST NW

Washington, DC 20005

202-551-1966

202-551-0466

robertluskin@paulhastings.com

Terrance G. Reed (VA Bar No.46076)

Lankford & Reed PLLC

120 N. St. Asaph St.

Alexandria, VA 22314

Phone: (703) 299-5000 Facsimile: (703) 299-8876

Email: tgreed@lrfirm.net

Attorneys for Stefan A. Halper

## **CERTIFICATE OF SERVICE**

I, Terrance Reed, counsel for Defendant, hereby certify that on this 1<sup>st</sup> day of August, 2022, I served the foregoing Notice of Deposition of Plaintiff Svetlana Lokhova by first class mail, postage prepaid, upon counsel for Plaintiff at the

## following address:

Leslie McAdoo Gordon MCADOO GORDON & ASSOCIATES, P.C. 1629 K Street, N.W., Suite 300. Washington, DC 20006

Terrance G. Reed (VA Bar No.46076)

Lankford & Reed PLLC 120 N. St. Asaph St. Alexandria, VA 22314

Phone: (703) 299-5000 Facsimile: (703) 299-8876 Email: tgreed@lrfirm.net